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Proposed Counsel to Metropolitan Commercial Bank

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:)	Chapter 11
)	
VOYAGER DIGITAL HOLDINGS, INC. <i>et al.</i> , ¹)	Case No. 22-10943 (MEW)
)	
Debtors.)	(Jointly Administered)
)	

**NOTICE OF APPEARANCE AND REQUEST FOR
SERVICE OF ALL PLEADINGS AND DOCUMENTS**

PLEASE TAKE NOTICE that the undersigned attorney hereby appears in the above-captioned cases as counsel to Metropolitan Commercial Bank. (“Metropolitan”). Metropolitan enters its appearance pursuant to section 1109(b) of title 11 of the United States Code (the “Bankruptcy Code”) and requests, pursuant to Rules 2002(i), 9007 and 9010(b) of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), that copies of all notices given or required to be given, and all papers served or required to be served in this case, be given to and served upon the undersigned either electronically consistent with the Court’s CM/ECF procedures or at the address set forth below:

George H. Singer, Esquire

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number are: Voyager Digital Holdings, Inc. (7687); Voyager Digital Ltd. (N/A); and Voyager Digital, LLC (8013). The location of the Debtors’ principal place of business is 33 Irving Place, Suite 3060, New York, NY 10003.

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PLEASE TAKE FURTHER NOTICE that the foregoing request includes not only notices and papers referred to in the Federal Rules of Bankruptcy Procedure specified above, but also includes, without limitation, all orders and notices of any application, motion, order, petition, pleading, request, complaint, or demand, statement of affairs, operating report, schedule of assets and liabilities, whether formal or informal, whether written or oral, and whether transmitted or conveyed by mail, hand delivery, telephone, facsimile transmission, or otherwise, that affects the debtor, property of the debtor, or property of the estate.

PLEASE TAKE FURTHER NOTICE that the request is also made that the attorney identified herein be added to the official service list for notice of all contested matters, adversary proceedings, and other proceedings in this case.

PLEASE TAKE FURTHER NOTICE that this entry of appearance shall not be deemed or construed to be a waiver of the right of Metropolitan (i) to have final orders in noncore matters entered only after de-novo review by a district judge; (ii) to trial by jury in any proceeding so triable in this case, or in any case, controversy, or proceeding related to this case; (iii) to have the district court withdraw the reference in any matter subject to mandatory or discretionary withdrawal; or (iv) to assert or exercise any other rights, claims, actions, defenses, setoffs, or recoupments to which Metropolitan is or may be entitled, in law or in equity, all of which rights, claims, actions, defenses, setoffs, and recoupments are hereby expressly reserved.

Dated: July 8, 2022

s/ George H. Singer
George H. Singer

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*Proposed Counsel to Metropolitan Commercial
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CERTIFICATE OF SERVICE

I hereby certify that on the 8th day of July, 2022, I caused a true and correct copy of the foregoing *Notice of Appearance and Request for Service of All Pleadings and Documents* to be served upon all parties requesting notice via the Court's CM/ECF system.

Dated: July 8, 2022

s/ George H. Singer

George H. Singer